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April 20, 2022

**VIA ECF**

The Honorable George B. Daniels  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1310  
New York, New York 10007-1312

RE: *In re M/V MSC FLAMINIA*  
Master File: SDNY No. 12-cv-8892 (GBD) (SLC)  
Request to Extend Scheduling Order  
NHS File No.: 28000040 JAVN

Dear Judge Daniels:

We are the attorneys for Stolt Tank Containers B.V. and Stolt Nielsen USA, Inc. (“Stolt”). We submit this joint letter of request on behalf of all parties that remain in this action.

In this action, Stolt, together with Deltech Corporation (“Deltech”), are defending against damage claims asserted by Conti 11 Container Schiffahrts-GMBH & Co. KG MSC “FLAMINIA” (“Conti 11”) and NSB Niederelbe Schifffahrtsgesellschaft MBH & Co. KG (“NSB”), and against damage claims asserted by MSC Mediterranean Shipping Company S.A. (“MSC”). BDP International Inc. (“BDP”) is defending against a claim for breach of contract damages asserted by Stolt.

This letter is submitted to respectfully request an adjournment of the status conference with Your Honor which is currently scheduled for April 26, 2022. (Doc. 1705).

We respectfully request a rescheduling of the upcoming conference to a date at the Court’s convenience.

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Please contact us if there are any questions.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By: s/ *John A. V. Nicoletti*

John A. V. Nicoletti

JAVN/RAN/kl

**cc (via ECF):**

All Counsel of Record